

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
LETICIA FRANCINE STIDHUM,

Plaintiff,

-against-

161-10 HILLSIDE AUTO AVE, LLC d/b/a Hillside
Auto Outlet, HILLSIDE AUTO MALL INC. d/b/a
Hillside Auto Mall, ISHAQUE THANWALLA,
JORY BARON, RONALD M. BARON, and
ANDRIS GUZMAN,

Defendants.
-----X

Case No.: 1:21-cv-7163 (HG) (RLM)

**DECLARATION OF
DEANA JENNINGS**

Deana Jennings declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am the designated corporate representative of Defendants 161-10 Hillside Auto Ave, LLC d/b/a Hillside Auto Outlet (hereinafter "Hillside Auto Outlet") and Hillside Auto Mall Inc. d/b/a Hillside Auto Mall ("Hillside Auto Mall") (Hillside Auto Outlet and Hillside Auto Mall collectively hereinafter the "Corporate Defendants") in the above-referenced case, and have served as a part-time controller for Hillside Auto Outlet during the time Plaintiff worked there and have also served as a controller for Hillside Auto Mall, where I remain employed today.
2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the documents I maintain at Hillside Auto Mall as well as at Hillside Auto Outlet during my tenure there.
3. I have conducted a search of my telephone for all text messages related to the Plaintiff.
4. I am not in possession, custody, or control of any responsive text messages.

5. I also searched my emails and am not in possession, custody, or control of any responsive emails other than those with my counsel.

6. I do not recall exchanging any emails with the Plaintiff.

7. Similarly, I conducted a search for the weekly sales logs of Hillside Auto Outlet and am unable to find them.

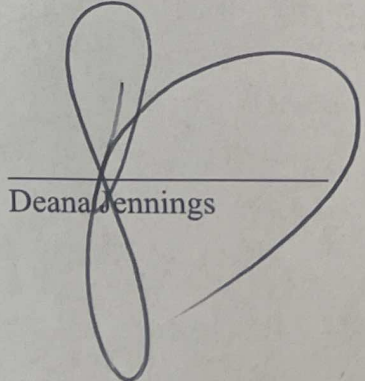
8. As I recall, we moved those and other records to an outside storage facility due to construction at Hillside Auto Mall.

9. I searched that outside storage facility for these records on May 9, 2023 after I could not find them at the dealerships.

10. I was unable to find the records at either dealership nor at the outside storage facility.

11. I am uncertain as to where they may be stored and have no knowledge nor recollection as to where they are kept.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 17, 2023.


Deana Jennings